ConocoPhillips

Bayway Refinery
P.O. Box 222
1400 Park Avenue
Linden, New Jersey 07036

Certified Mail - RRR
7005 1140 0003 9477 5800

February 9, 2011

US Environmental Protection Agency
Ariel Rios Building
Mail Code 2254A
1200 Pennsylvania Avenue, NW,
Washington, DC 20460
Attn: Robert G. Heiss, Director
International Compliance Assurance Division

2010 Annual Export Report
NJD 986 645 984

Dear Mr. Heiss:

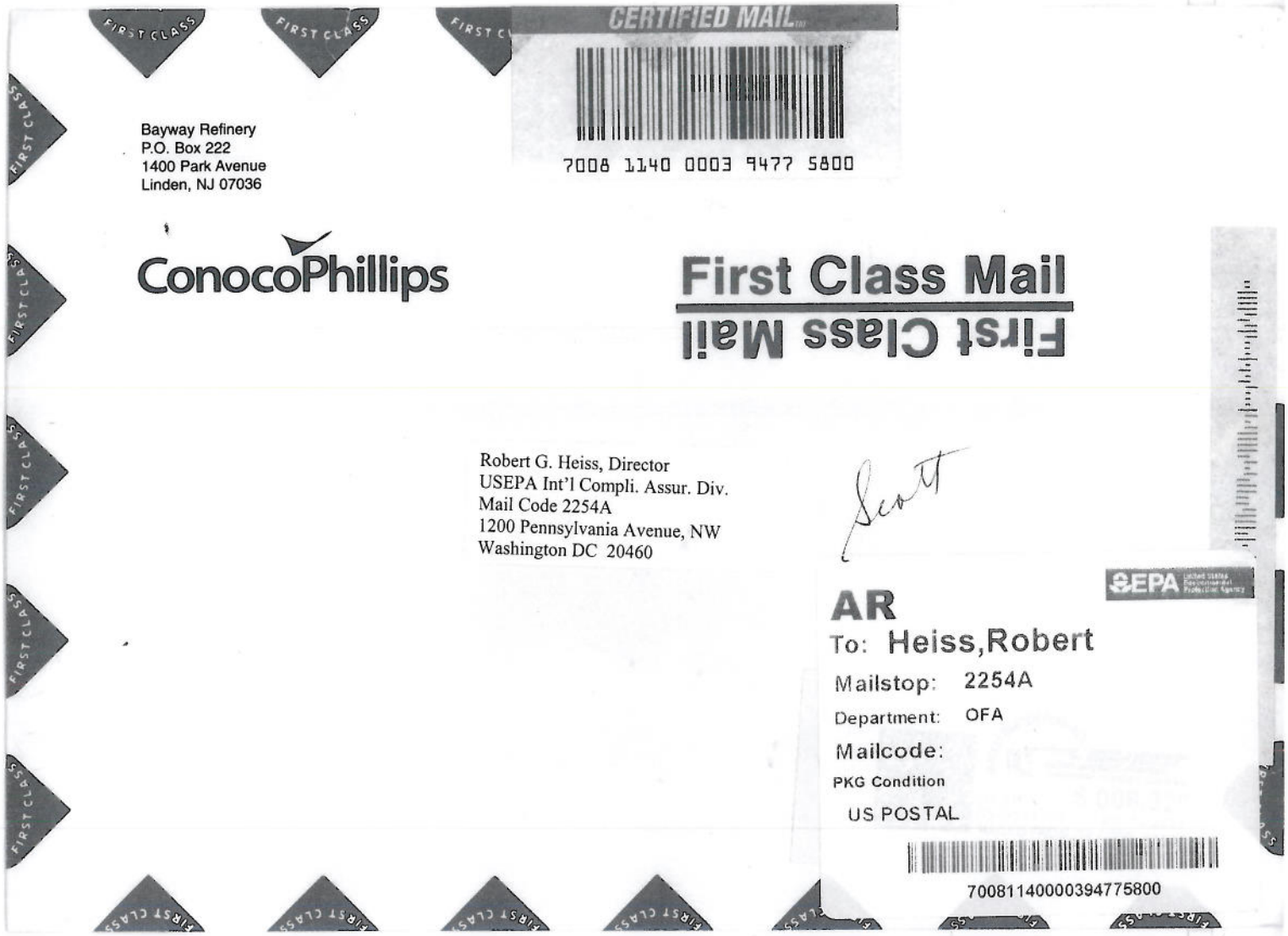
As required by Section 3017 of the Resource Conservation and Recovery Act and under Federal regulations 40 CFR Sections 262.56 and 262.87(a), I submit the "Annual Report of Hazardous Waste Exports for 2010" and waste minimization statements for the ConocoPhillips owned and operated Bayway Refinery. The refinery is located at 1400 Park Avenue, Linden, New Jersey 07036.

Contact me at (908) 523-5732 if you need additional information.

Sincerely,

Hans Sidler
Waste Compliance Engineer

received
SDM 2/16/11



CERTIFIED MAIL

7008 1140 0003 9477 5800

Bayway Refinery
P.O. Box 222
1400 Park Avenue
Linden, NJ 07036

ConocoPhillips

First Class Mail

Robert G. Heiss, Director
USEPA Int'l Compli. Assur. Div.
Mail Code 2254A
1200 Pennsylvania Avenue, NW
Washington DC 20460

AR
To: Heiss,Robert
Mailstop: 2254A
Department: OFA
Mailcode:
PKG Condition
US POSTAL

7008114000039477 5800

ANNUAL REPORT OF HAZARDOUS WASTE EXPORTS FOR 2010

1. **PRIMARY EXPORTER** (Consignor)
   Name: ConocoPhillips Company / Bayway Refinery
   EPA ID No. NJD 986645984
   Mailing Address: P.O. Box 222
   City: Linden State: New Jersey Zip: 07036

2. **CONSIGNEE**
   Name: STABLEX Canada, Inc.
   Address 760 Industrial Blvd.
   Blainville, Quebec Canada J7C3V4
   EPA ID No.: NYD 980756415

3. **TRANSPORTER No. 1:** Name: Freehold Cartage Inc.
   EPA ID No.: NJD 054126164
   TRANSPORTER No. 2: Name: Transport Rollex Limitee
   EPA ID No.: NYF 006000053
   TRANSPORTER No. 3: Name:
   EPA ID No.:

4. **WASTE INFORMATION**
   Description of Waste: Spent Sandblast Abrasives

   EPA Waste Numbers: D008

   DOT Proper Shipping Name: RQ Waste Environmentally Hazardous Substance, Solid, n.o.s.,(D008), III,

   DOT Hazard Class: 9 DOT ID Code (UN/NA): UN 3077

5. **SHIPPING INFORMATION**

   Number of Shipments during the Calendar Year: 3
   Total Volume of this Waste Shipped: 33.75 tons

   ≈ 67500 #

6. **WASTE MINIMIZATION STATEMENT**

   _____ Not Required (See Instructions)

   _____ Submitted with EPA Biennial Report

   x Attached

7. **CERTIFICATION**

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment.

Name of Responsible Official: Hans Sidler **Title:** Waste Compliance Engineer

Signed: _____ **Date:** 2/9/2011

ANNUAL REPORT OF HAZARDOUS WASTE EXPORTS FOR 2010

1. **PRIMARY EXPORTER** (Consignor)

Name: ConocoPhillips Company / Bayway Refinery
EPA ID No. NJD 986645984
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2. **CONSIGNEE**

Name: STABLEX Canada, Inc.
Address 760 Industrial Blvd.
Blainville, Quebec Canada J7C3V4
EPA ID No.: NYD 980756415

3. **TRANSPORTER No. 1:** Name: Transport Rollex Limitee
EPA ID No.: NYF 006000053

TRANSPORTER No. 2: Name:
EPA ID No.:

4. **WASTE INFORMATION**

Description of Waste: Lead Acid Batteries

EPA Waste Numbers: D002, D008

DOT Proper Shipping Name: RQ Waste Batteries, Wet, Filled with Acid, PG III

DOT Hazard Class: 8 DOT ID Code (UN/NA): UN 2794

5. **SHIPPING INFORMATION**

Number of Shipments during the Calendar Year: 3
Total Volume of this Waste Shipped: 2.02 tons

6. **WASTE MINIMIZATION STATEMENT** = 4040 P

_____ Not Required (See Instructions)

_____ Submitted with EPA Biennial Report

_x_ Attached

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I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment.

Name of Responsible Official: Hans Sidler **Title:** Waste Compliance Engineer

Signed: [signature] **Date:** 2/9/2011

ANNUAL REPORT OF HAZARDOUS WASTE EXPORTS FOR 2010

1. **PRIMARY EXPORTER** (Consignor)
   Name: ConocoPhillips Company / Bayway Refinery
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2. **CONSIGNEE**
   Name: STABLEX Canada, Inc.
   Address 760 Industrial Blvd.
   Blainville, Quebec Canada J7C3V4
   EPA ID No.: NYD 980756415

3. **TRANSPORTER No. 1:** Name: Transport Rollex Limitee
   EPA ID No.: NYF 006000053

   TRANSPORTER No. 2: Name:
   EPA ID No.:

4. **WASTE INFORMATION**
   Description of Waste: Mixed Batteries

   EPA Waste Numbers: D003, D006, D011, D008

   DOT Proper Shipping Name: RQ Waste Batteries, Dry, Containing Potassium Hydroxide Solid, PG III,

   DOT Hazard Class: 8 DOT ID Code (UN/NA): UN3028

5. **SHIPPING INFORMATION**

   Number of Shipments during the Calendar Year: 3
   Total Volume of this Waste Shipped: 0.45 tons
   = 700 #

6. **WASTE MINIMIZATION STATEMENT**

   _____ Not Required (See Instructions)

   _____ Submitted with EPA Biennial Report

   x Attached

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Name of Responsible Official: Hans Sidler **Title:** Waste Compliance Engineer

Signed: _____ **Date:** 2/9/2011

ANNUAL REPORT OF HAZARDOUS WASTE EXPORTS FOR 2010

1. **PRIMARY EXPORTER** (Consignor)
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2. **CONSIGNEE**
   Name: STABLEX Canada, Inc.
   Address 760 Industrial Blvd.
   Blainville, Quebec Canada J7C3V4
   EPA ID No.: NYD 980756415

3. **TRANSPORTER No. 1:** Name: Transport Rollex Limitee
   EPA ID No.: NYF 006000053

   TRANSPORTER No. 2: Name:
   EPA ID No.:

4. **WASTE INFORMATION**
   Description of Waste: Catalyst (Zinc Oxide)

   EPA Waste Numbers: K171

   DOT Proper Shipping Name: Waste Environmentally Hazardous Substance, n.o.s.,(K171), III, RQ-1 (K171)

   DOT Hazard Class: 9 DOT ID Code (UN/NA): UN3077

5. **SHIPPING INFORMATION**

   Number of Shipments during the Calendar Year: 1
   Total Volume of this Waste Shipped: 3.90 tons

   =7800 #

6. **WASTE MINIMIZATION STATEMENT**

   _____ Not Required (See Instructions)

   _____ Submitted with EPA Biennial Report

   x Attached

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Name of Responsible Official: Hans Sidler **Title:** Waste Compliance Engineer

Signed: H E S **Date:** 2/9/2011

ANNUAL REPORT OF HAZARDOUS WASTE EXPORTS FOR 2010

1. **PRIMARY EXPORTER** (Consignor)

Name: ConocoPhillips Company / Bayway Refinery
EPA ID No. NJD 986645984
Mailing Address: P.O. Box 222
City: Linden State: New Jersey Zip: 07036

2. **CONSIGNEE**

Name: STABLEX Canada, Inc.
Address 760 Industrial Blvd.
Blainville, Quebec Canada J7C3V4
EPA ID No.: NYD 980756415

3. **TRANSPORTER No. 1:** Name: Transport Rollex Limitee
EPA ID No.: NYF 006000053

TRANSPORTER No. 2: Name:
EPA ID No.:

4. **WASTE INFORMATION**

Description of Waste: Abrasives and Paint Chips

EPA Waste Numbers: D008, D007

DOT Proper Shipping Name: RQ Waste Environmentally Hazardous Substance, Solid, n.o.s.,(D008, D007), III,

DOT Hazard Class: 9 DOT ID Code (UN/NA): UN 3077

5. **SHIPPING INFORMATION**

Number of Shipments during the Calendar Year: 1
Total Volume of this Waste Shipped: 2.45 tons

= 4900 #

6. **WASTE MINIMIZATION STATEMENT**

_____ Not Required (See Instructions)

_____ Submitted with EPA Biennial Report

x Attached

7. **CERTIFICATION**

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment.

Name of Responsible Official: Hans Sidler **Title:** Waste Compliance Engineer

Signed: [signature] **Date:** 2/9/2011

Waste Minimization Statement for Hazardous Characteristic Contaminated Spent Sandblast Abrasives

The ConocoPhillips Company owned and operated Bayway Refinery is committed to operating the refinery in an environmentally responsible manner. A source reduction program has been implemented and is continuously being improved.

The Bayway Refinery utilizes crude petroleum as feed stock to produce a complete line of fuel products as well as petrochemical feed stocks and specialty products. The facility does not purchase or produce lead or other hazardous characteristic containing products. The Bayway Refinery uses only environmentally friendly, non-lead based coatings on new and repaired equipment.

As part of the operations of the refinery, rust, scale and paint are removed from transfer lines, storage tanks and process equipment by sand blasting with abrasives in order to prepare surfaces for metal inspection, welding or repainting. Employees have been informed of the potential for lead based coatings at the refinery. They are trained to test dry paints and primers prior to removal and to segregate contaminated media from each job site regardless of generated volume.

Old protective coatings slated for removal are tested by analysis and/or lead stick for lead content. Rather than using a dry sandblast technique, lead based paint from transfer lines, storage tanks and process equipment in difficult to access areas is removed by scraping or by high pressure water and wet garnet blasting, whenever feasible.

Paint removal from tanks is accomplished by either pressure washing, or by utilizing the "Versa Blast" vertical blast cleaning system. The system cleans vertical surfaces by using steel split shot and a very small amount of grit as the blast cleaning media. A hoist system, which is mounted on a fixture at the top of the tank being cleaned, raises and lowers the blast module as the module moves along the surface horizontally. The system is capable of providing white metal finishes.

The horizontal speed, vertical speed, shot flow rate, and fixture movement are adjusted by remote control. The abrasive media are contained, circulated, and cleaned within the blast module. A cyclone separator on the ground separates the steel split shot from the media for re-use and deposits the paint and dust into plastic lined 55-gallon drums. The process reduces the volume of generated lead contaminated hazardous abrasives by up to 95%.

The Bayway Refinery has considered several waste management method alternatives. On-site remediation or fixation of the lead constituent contained in the waste is not feasible because of cost and the lack of treatment permits. Treatment of the low BTU waste by incineration does not reduce the lead hazard and would result in impermissible dilution of the lead component in the incinerator ash.

This minimization statement pertains to shipments of Hazardous Characteristic Contaminated Spent Sandblast Abrasives on pages 1 and 5 of the annual report.

Waste Minimization Statement for Spent Lead Acid Batteries

The ConocoPhillips Company owned and operated Bayway Refinery is committed to operating the refinery in an environmentally responsible manner. A source reduction program has been implemented and is continuously being improved.

The Bayway Refinery has approximately 100 substations which distribute electric power to the various process units. Energy for the substation switchgear and control panels is provided by twelve to sixty lead acid batteries per station. These batteries are periodically replaced to ensure a reliable and uninterrupted electric power supply to the refinery.

The Bayway Refinery is taking source reduction action to reduce the volume of generated used lead acid batteries from substations by choosing high-grade replacement batteries that have an estimated useful service life of more than twenty years. When the refinery purchases automotive lead acid batteries for its fleet of cars, trucks and heavy equipment, an equivalent number of spent automotive batteries is returned to the supplier for recycling.

The Bayway Refinery has considered several waste management method alternatives for lead acid batteries from substations. Shipping these batteries for metal reclamation to a lead smelter in Missouri is deemed unacceptable because of potential future environmental liability concerns. State and Federal agencies have determined that many residential properties in the vicinity of the Missouri plant have been contaminated by lead emissions from the smelting operation. The facility has also received many citations and fines.

In the absence of an alternate and readily available lead smelting facility which is protective to human health and the environment, the Bayway Refinery believes that the present method of shipping the batteries to a competent and experienced waste management service provider for treatment and disposal to be an environmentally sound option.

This minimization statement pertains to shipments of Spent Lead Acid Batteries on page 2 of the annual report.

Waste Minimization Statement for Mixed Batteries

The ConocoPhillips Company owned and operated Bayway Refinery is committed to operating the refinery in an environmentally responsible manner. A source reduction program has been implemented and is continuously being improved.

Bayway Refinery employees and contractors use a variety of equipment and tools that are powered by batteries, including alkaline, silver oxide, lithium, nickel/metal hydride and various other types. Spent batteries are collected and placed into satellite accumulation containers.

The Bayway Refinery has considered sorting the batteries by type in order to make them amenable to metal reclamation. Spent batteries come in all shapes and sizes and vary in length from a fraction of an inch to several inches each. Experience has shown that sorting of those batteries by type to render them acceptable for metal reclamation is tedious, time consuming and subject to human error. Sorting and subsequent transportation of the small volume of generated batteries to various facilities is not cost-effective.

The Bayway Refinery believes that the proper treatment and disposal of a limited volume mixed batteries by a competent and experienced waste management service provider is protective to human health and the environment and constitutes currently the most economically practicable waste management option available to us.

This minimization statement pertains to shipments of Mixed Batteries on pages 3 of the annual report.

Waste Minimization Statement for Spent listed Hazardous K171 Catalyst

The ConocoPhillips Company owned and operated Bayway Refinery is committed to operating the refinery in an environmentally responsible manner. A source reduction program has been implemented and is continuously being improved.

The Bayway Refinery utilizes crude petroleum as a feed stock to produce a complete line of fuel products as well as petrochemical feed stocks and specialty products. As part of the operations of the refinery, a sulfur guard bed at the Hydrogen Process Unit was placed into service to remove trace amounts of sulfur contaminants from natural gas feedstock. The sulfur contaminants are removed by contacting the product with a Zinc oxide catalyst (ZnO).

Over time, the sulfur removal efficiency of the ZnO oxide catalyst decreases. The reactor is taken off-line and isolated. The spent catalyst is cooled to ambient temperatures and placed into 55-gallon capacity drums. Representative samples are taken and submitted to a State certified third-party contract laboratory for the analysis of waste classification parameters.

The Bayway Refinery has carefully evaluated a number of other catalysts to effect the removal of trace level sulfur contaminants from natural gas feedstock. The ZnO replacement catalyst was chosen because it is more reactive with sulfur and is capable of higher sulfur loading. Since ZnO catalyst requires less frequent catalyst change-outs, lesser volumes of spent catalyst will be generated. Strict adherence to detailed catalyst deactivation and change-out procedures reduces toxicity.

The Bayway Refinery has considered several waste management method alternatives for the spent ZnO catalyst. Off-site thermal treatment is not cost-effective and provides minimal environmental benefit since the sum of all organic constituents in the spent ZnO catalyst comprises less than 0.05 percent of the total spent catalyst volume. Furthermore, treatment of the spent ZnO catalyst by incineration does not reduce the arsenic hazard and would result in impermissible dilution of the arsenic component in the incinerator ash.

The Bayway Refinery has contacted several domestic metal reclamation facilities. Most of the plants determined that spent ZnO catalyst is not compatible with their metal reclamation process. Facilities that could have processed the catalyst lacked RCRA hazardous waste permits. The Bayway Refinery believes that Stablex, with its considerable expertise in the chemical treatment and fixation of inorganic waste constituents, is currently the best available option for the environmentally sound disposition of deactivated spent ZnO catalyst.

This minimization statement pertains to shipments of Catalyst Desiccant on page 4 of the annual report.

Waste Minimization Statement for Lead Contaminated Abrasives and Paint Chips

The ConocoPhillips Company owned and operated Bayway Refinery is committed to operating the refinery in an environmentally responsible manner. A source reduction program has been implemented and is continuously being improved.

The Bayway Refinery utilizes crude petroleum as feed stock to produce a complete line of fuel products as well as petrochemical feed stocks and specialty products. The facility does not purchase or produce lead containing products. The Bayway Refinery uses only environmentally friendly, non-lead based coatings on new and repaired equipment.

As part of the operations of the refinery, rust, scale and paint are removed from transfer lines, storage tanks and process equipment by sand blasting with abrasives in order to prepare surfaces for metal inspection, welding or repainting. Employees have been informed of the potential for lead based coatings at the refinery. They are trained to test dry paints and primers prior to removal and to segregate contaminated media from each job site regardless of generated volume.

Old protective coatings slated for removal are tested by analysis and/or lead stick for lead content. Rather than using a dry sandblast technique, lead based paint from transfer lines, storage tanks and process equipment in difficult to access areas is removed by scraping or by high pressure water and wet garnet blasting, whenever feasible.

Paint removal from tanks is accomplished by either pressure washing, or by utilizing the "Versa Blast" vertical blast cleaning system. The system cleans vertical surfaces by using steel split shot and a very small amount of grit as the blast cleaning media. A hoist system, which is mounted on a fixture at the top of the tank being cleaned, raises and lowers the blast module as the module moves along the surface horizontally. The system is capable of providing white metal finishes.

The horizontal speed, vertical speed, shot flow rate, and fixture movement are adjusted by remote control. The abrasive media are contained, circulated, and cleaned within the blast module. A cyclone separator on the ground separates the steel split shot from the media for re-use and deposits the paint and dust into plastic lined 55-gallon drums. The process reduces the volume of generated lead contaminated hazardous abrasives by up to 95%.

The Bayway Refinery has considered several waste management method alternatives. On-site remediation or fixation of the lead constituent contained in the waste is not feasible because of cost and the lack of treatment permits. Treatment of the low BTU waste by incineration does not reduce the lead hazard and would result in impermissible dilution of the lead component in the incinerator ash.

This minimization statement pertains to shipments of Lead Contaminated Paint Chips on page 5 of the annual report